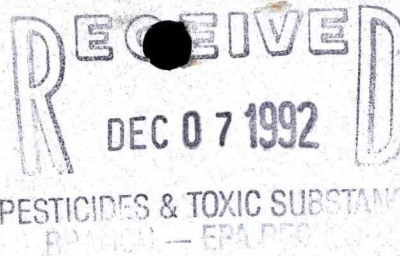




**BURLINGTON  
ENVIRONMENTAL**



December 4, 1992

CERTIFIED MAIL

Mr. William M. Hedgebeth  
PCB Team Leader, Toxic Substances Section  
U.S. EPA  
1200 Sixth Avenue, M/S AT-083  
Seattle, WA 98101

Mr. Hedgebeth:

Burlington Environmental Inc. (BE) has received EPA's November 27, 1992 letter (attached) regarding the TSCA - PCB inspection of the BE Georgetown Facility completed by W. Douglas Smith on January 22, 1992.

As noted, PCBs were located in storage areas designated as LW2A, LW3, LW4, CW6 (Bays A, B, and C), and NW63. These designations represent the container stacking patterns for RCRA wastes as described in the facility's RCRA Part B Permit Application (drawing attached). A separate designation system is employed for TSCA regulated wastes (e.g. F-1; F-1A; F-2; P-1; C-7A, B, C; C-8A, B). This system is presented in the Georgetown Facility Commercial PCB Storage Facility Application (drawing attached).

The RCRA stacking patterns and designations cover the same physical locations as the TSCA stacking patterns and designations, however, they do not coincide directly with those employed for the TSCA wastes. The RCRA stacking patterns represent the maximum number of RCRA containers per stack which could be stored in the absence of any TSCA wastes. Further, the TSCA wastes are stored trays (except for area P-1) and the containment volume requirements exceed those of RCRA wastes. This requires BE to use two separate systems.

During the inspection, the TSCA stacking designations were not clearly marked and distinguished from the RCRA stacking designations. This has been corrected. BE will continue to store TSCA waste only in TSCA permitted areas using the stacking patterns and designations presented in the Commercial PCB Storage Facility Application.

If you have any questions or require further information, please contact John Stiller at (206) 223-7595 or me at (206) 762-3362.

Sincerely,

David L. Aubry  
Division Manager, Treatment

Attachments (3)

